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### UNITED STATES DISTRICT COURT

### DISTRICT OF NEVADA

LENARD E. SCHWARTZER, in his capacity as the Bankruptcy Trustee for the Bankruptcy Estate of Alisson Santos,

Plaintiff,

VS.

AMERICAN FAMILY MUTUAL INSURANCE COMPANY, a corporation; and DOES I through V; and, ROE CORPORATIONS VI through X, inclusive,

Defendants.

CASE NO.: 2:15-cv-01115-APG-PAL

JOINT STIPULATION AND ORDER TO EXTEND TIME TO SUBMIT JOINT PRETRIAL ORDER (First Request)

IT IS HEREBY STIPULATED AND AGREED, by Plaintiff, LENARD E. SCHWARTZER and Defendant AMERICAN FAMILY MUTUAL INSURANCE COMPANY, by and through their undersigned counsel, that the following extension be made to the pretrial order schedule in this matter. If granted, this will be the first extension to the pretrial order schedule.

Counsel for Plaintiff and Defendant have been unable to meet to review the proposed exhibits before submitting a pretrial order, as requested by the Honorable Judge Gordon, and now request an extension of time to do so. Counsel for both Parties have exchanged exhibits and pageline designations for proposed depositions, and are in the process of finalizing stipulations to exhibits. Counsel have been unable to conduct the meet and confer as required as Counsel for

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Plaintiff has been conducting depositions and mediations all week, and counsel for Defendant has
been ill, creating a situation where neither party has been able to meet with the other. Additionally
counsel for Plaintiff will be out of town from January 26, 2017, until January 30, 2017, on pre-
existing business, creating an insurmountable obstacle to convening a physical meeting of both
counsel before the deadline on January 27, 2017. Counsel for both parties now stipulate and agree
to the following:

Counsel for Plaintiff and Defendant shall have up to and including February 3,
 2017, to conduct a meaningful meet and confer and submit a joint pretrial order that complies with Local Rules 16-3 and 16-4 and this Court's December 28, 2016
 Order.

## /s/ MARK L. JACKSON

# /s/TROY A. CLARK

PAUL A. ACKER, ESQ.

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Nevada Bar No.: 3670 TROY A. CLARK, ESQ. Nevada Bar No.: 11361 BREMER WHYTE BROWN & O'MEARA, LLP 1160 N. Town Center Dr., Suite 250 Las Vegas, Nevada 89144 Counsel for Defendant

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# **ORDER**

### IT IS HEREBY ORDERED, ADJUDGED, AND DECREED:

1. Counsel for Plaintiff and Defendant shall have up to and including February 3, 2017, to conduct a meaningful meet and confer and submit a joint pretrial order that complies with Local Rules 16-3 and 16-4 and this Court's December 28, 2016 Order.

IT IS SO ORDERED this 9th day of March , 2017.

U.S. DISTRICT COURT JUDGE

Respectfully submitted: January 25, 2017

/s/ MARK L. JACKSON	/s/TROY A. CLARK		
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